

**BATHAE DUNNE LLP**

Yavar Bathae (CA 282388)  
Andrew C. Wolinsky (CA 345965)  
445 Park Avenue, 9th Floor  
New York, NY 10022  
Tel.: (332) 322-8835  
yavar@bathaeedunne.com  
awolinsky@bathaeedunne.com

**BATHAE DUNNE LLP**

Brian J. Dunne (CA 275689)  
Edward M. Grauman (admitted *pro hac vice*)  
901 S. MoPac Expressway  
Barton Oaks Plaza I, Suite 300  
Austin, TX 78746  
Tel.: (213) 462-2772  
bdunne@bathaeedunne.com  
egrauman@bathaeedunne.com

*Interim Co-Lead Counsel for the Advertiser  
Classes*

**SCOTT+SCOTT ATTORNEYS AT LAW  
LLP**

Amanda F. Lawrence (admitted *pro hac vice*)  
Patrick J. McGahan (admitted *pro hac vice*)  
Michael P. Srodoski (admitted *pro hac vice*)  
156 South Main Street, P.O. Box 192  
Colchester, CT 06415  
Tel.: (860) 537-5537  
alawrence@scott-scott.com  
pmcgahan@scott-scott.com  
msrodoski@scott-scott.com

**SCOTT+SCOTT ATTORNEYS AT LAW  
LLP**

Patrick J. Coughlin (CA 111070)  
Carmen A. Medici (CA 248417)  
Hal D. Cunningham (CA 243048)  
Daniel J. Brockwell (CA 335983)  
600 W. Broadway, Suite 3300  
San Diego, CA 92101  
Tel.: (619) 233-4565  
pcoughlin@scott-scott.com  
cmedici@scott-scott.com  
hcunningham@scott-scott.com  
dbrockwell@scott-scott.com

[Additional counsel on signature page.]

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

MAXIMILIAN KLEIN, et al.,

Plaintiffs,

vs.

META PLATFORMS, INC.,

Defendant.

Consolidated Case No. 3:20-cv-08570-JD

Hon. James Donato

**DECLARATION OF AMANDA F.  
LAWRENCE IN SUPPORT OF  
PLAINTIFFS' ADMINISTRATIVE  
MOTION TO CONSIDER WHETHER  
ANOTHER PARTY'S MATERIAL  
SHOULD BE SEALED**

1 I, Amanda F. Lawrence, declare and state as follows:

2 1. I am a member of the law firm Scott+Scott Attorneys at Law LLP, counsel for the  
3 Advertiser Plaintiffs, and have been admitted *pro hac vice* in the above-captioned matter. I have  
4 personal knowledge of the facts set forth in this declaration and, if called as a witness, could and  
5 would testify competently to such facts under oath.

6 2. Pursuant to Civil Local Rules 7-11 and 79-5(f), I submit this declaration in support  
7 of Plaintiffs' concurrently-filed Administrative Motion to Consider Whether Another Party's  
8 Materials Should Be Sealed.

9 3. Certain documents and information referenced in the discovery dispute letter have  
10 been designated by Defendant Meta Platforms, Inc. ("Meta Platforms") as "Confidential" or "Highly  
11 Confidential" under the Stipulated Protective Order (ECF No. 314).

12 4. Portions of the discovery dispute letter referencing or reflecting the contents of the  
13 documents and information designated by Meta Platforms as "Confidential" or "Highly  
14 Confidential" have been redacted from the publicly filed version of the letter. *See* Civil L.R. 79-  
15 5(e)(1).

16 5. An unredacted version of the discovery dispute letter with these references  
17 highlighted is filed herewith. *See* Civil L.R. 79-5(e)(2), (f)(1).

18 6. Plaintiffs' request is limited to documents and information produced by Meta  
19 Platforms marked Confidential or Highly Confidential, or information directly reflecting documents  
20 and information produced by Meta Platforms marked Confidential or Highly Confidential. This  
21 request is thus narrowly tailored to seek sealing only of potentially sealable material.

22 I declare under penalty of perjury that the foregoing is true and correct.

23 Executed on May 16, 2023, in Colchester, Connecticut.

24 s/ Amanda F. Lawrence  
25 Amanda F. Lawrence  
26  
27  
28